

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Filed by ECF

No. 13-cv-7074 (GBD)

FIONA HAVLISH, individually and
on behalf of the ESTATE OF
DONALD G. HAVLISH, JR.,
Deceased, et al.,

Petitioners,

v.

ROYAL DUTCH SHELL PLC
Carel van Bylandtlaan 30
2596 HR The Hague
The Netherlands

Respondent.

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Judgment Debtors:

Islamic Republic of Iran

National Iranian Oil Company

Islamic Revolutionary Guard Corp

Ministry of Petroleum

Ayatollah Ali Hosenei Khameneri

Ali Akbar Hashemi Rafsanjani

Ministry of Information and Security

National Iranian Tanker Corporation

National Iranian Gas Company

National Iranian Petrochemical Co.

Ministry of Econ. Affairs & Finance

Ministry of Commerce

Ministry of Defense & Armed Forces

Iran Airlines

Central Bank of Iran

Hezbollah

AMENDED STIPULATION AND CONSENT ORDER

This Amended Stipulation and Consent Order in the above-captioned action is entered into this 6th day of December 2013, by and among Fiona Havlish, individually and on behalf of the Estate of Donald G. Havlish, Jr., Deceased, et al. (collectively, the "Havlish Judgment Creditors" or the "Petitioners"), and respondent Royal Dutch Shell plc ("RDS" or "Respondent"), which appears specially for purposes of this Stipulation, without prejudice to its right to contest service and jurisdiction in this matter.

WHEREAS, Petitioners purport to hold an unsatisfied judgment in the amount of \$6,048,513,805, plus interest against the Islamic Republic of Iran and fifteen of its political subdivisions, agencies and instrumentalities (collectively, the "Iranian Judgment Debtors");

WHEREAS, on October 4, 2013, Petitioners filed in this Court a Petition seeking to garnish approximately \$2,336,000,000 in funds allegedly held by RDS as a payable to the National Iranian Oil Company, one of the Iranian Judgment Debtors (the "Petition");

WHEREAS, on October 7, 2013, this Court issued an Order scheduling an initial pretrial conference in this action for Wednesday, December 18, 2013, at 9:30 a.m.;

WHEREAS, Respondent has filed its motion to dismiss and the parties have agreed that the Petitioner has through April 24, 2014 to respond and Respondent has through May 16, 2014 to reply (without prejudice to Respondent's right to contest service and jurisdiction);

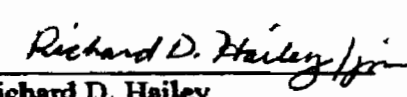
IT IS THEREFORE AND HEREBY AGREED AND ORDERED THAT:

1. Petitioners' time to file an opposition to Respondent's motion to dismiss filed January 27, 2014 is extended from February 24, 2014 to April 24, 2014, and Respondent's time to file a reply is extended from March 10, 2014 to May 16, 2014.
2. Nothing in this Stipulation and Consent Order will be deemed a waiver of Respondent's objections as to service, jurisdiction or venue.

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Attorneys for Petitioners

SO ORDERED:

George B. Daniels

Hon. George B. Daniels, USDJ
FEB 24 2014
_____, 2014